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April 16, 2025

Hon. Claire C. Cecchi, U.S.D.J. **United States District Court** District of New Jersey Martin Luther King, Jr. Courthouse 50 Walnut Street Newark, NJ 07101

Via Electronic Filing

Re: METROPOLITAN WOODWORKING, INC. v. LATOURETTE (2:24cv-07483)

Dear Judge Cecchi:

This firm represents Plaintiffs in the above referenced matter. This letter is to request an extension of the time to file Plaintiff's amended complaint, as set forth in your order of March 18, 2025. In your order, you permitted 30 days to file a proposed amended complaint. Unfortunately, last Monday my mother underwent emergency brain surgery and had been hospitalized for most of the week prior to the Passover holiday. Family obligations related to this emergency have limited my time in the office since that time, and I have not been able to complete work on the amended complaint. Due to my upcoming trial schedule, I am requesting a 21 day extension to file the amended complaint.

I have attempted to reach Defendants' counsel several times, but have not received a response as to this request.

Very truly yours,

Man E. Frink

Avram E. Frisch

Cc: Defendants' Counsel (NJ OAG)

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